FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6162
IMAT, Inc.

Issuance Date: June 27, 2001

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 6162. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the Clark County/Salmon Creek Publicly Owned Treatment Works (the POTW) through the Hazel Dell Sewer District (HDSD). This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix C—Response to Comments.

GENERAL INFORMATION	
Facility Name and Address:	IMAT, Inc. 12516 NE 95th Street, Suite D110 Vancouver, Washington 98682
Type of Facility:	Semiconductors and Related Devices
Standard Industrial Classification (SIC) Code:	3674
Facility Discharge Location:	This facility discharges to the Clark County/Salmon Creek Publicly Owned Treatment Works (the POTW). IMAT is connected to the sewage collection system of the POTW. The sewage collection system is under the jurisdiction of, and operated by, the Hazel Dell Sewer District (HDSD). The POTW is operated by Clark County. The sewer connection for IMAT is located at: Latitude: 45° 41' 24" N Longitude: 122° 32' 45" W The POTW is located in the southwest corner of the state of Washington, just north of Vancouver. The POTW is an activated sludge plant. The final effluent is discharged to the Columbia River in accordance with National Pollutant

GENERAL INFORMATION	
	Discharge Elimination System (NPDES) Permit No. WA0023639. The discharge location for the final effluent is at: Latitude: 45° 44' 27" N Longitude: 122° 45' 25" W
Contact at Facility:	Name: Tatsuo Nakato, President Telephone #: (360) 256-5600
Responsible Official:	Name: Tatsua Nakato Title: President Address: 12516 NE 95th Street, Suite D110 Vancouver, WA 98682 Telephone #: (360) 256-5600 FAX #: (360) 256-7766

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

IMAT operates a silicon wafer processing facility in Vancouver, Washington. IMAT's primary emphasis is to provide a silicon wafer research and development service, and the secondary function is to manufacture silicon-on-insulator wafers. The facility discharges neutralized wastewater to the Hazel Dell Sewer District (HDSD) which is served by the Clark County/Salmon Creek Publicly Owned Treatment Works (the POTW).

Silicon Evolutions Inc. (SEI) has sub-leased approximately one half of the building space from IMAT (the current and future state waste discharge permit holder). IMAT and SEI share same building, water supply system, deionized water facility, hydrofluoric acid collection tank, 3-stage continuous Acid Waste Neutralization (AWN) system, flow and pH measuring and recording devices and sewer outfall. SEI has added chemical mechanical polishing (CMP) and silicon wafer cleaning capability at the site previously occupied only by IMAT.

IMAT and SEI are classified as significant industrial users (SIUs) because they are categorical industrial users subject to federal categorical pretreatment standards. IMAT as well as SEI are classified under the 40 CFR Part 469 – Electrical and Electronic Components Point Source Category – Subpart A – Semiconductor Subcategory.

HISTORY AND PERMIT STATUS

A state waste discharge permit application was received on June 3, 1996, for IMAT. Additional information was received on February 20, 1998. A state waste discharge permit was issued for IMAT on September 30, 1999.

On August 24, 2000, the Department received a letter of disclosure from SEI describing SEI operation and wastewater discharge. On December 22, 2000, the Department received a letter from IMAT asking for direction in a new waste discharge situation. On January 25, 2001, SEI submitted additional information on wastewater flow measurement, hydrofluoric acid (HF) use, acid waste neutralization and expected wastewater flow from SEI and IMAT.

INDUSTRIAL PROCESSES

There are two basic manufacturing processes being carried out at IMAT. IMAT provides a semiconductor silicon wafer processing service in which silicon wafers are coated with a variety of films like silicon dioxide, aluminum, titanium, tungsten, and define as elemental or chemical compound. IMAT also manufactures silicon-on-insulator wafers using ion implantation of oxygen into silicon, and annealing at high temperature. Acid cleaning and rinsing are used in the processing and manufacturing.

SEI operates chemical mechanical polishing (CMP) and silicon wafer cleaning.

TREATMENT PROCESSES

The wastewater treatment is provided by a 3-stage pH neutralization system for pH control. Concentrated fluoride wastes are segregated and collected for off-site treatment and disposal. The photoresist wastes are also segregated and collected for off-site handling.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on January 26, 2001.

During the history of the permit, the Permittee has remained in compliance based on reports submitted to the Department and inspections conducted by the Department. However, on January 9, 2001, the Department sent a noncompliance notification to IMAT for non-reporting of average fluoride and maximum fluoride on the September 2000 Discharge Monitoring Report (DMR). During the inspection on January 26, 2001, it was explained that the fluoride samples have to be taken, analyzed and reported monthly.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge from IMAT was reported in the previous permit application and is listed in the following table:

Parameter	Units	Measured Value
Flow rate	gallons per day (gpd)	200
pH	standard units	Within the range of 6.9 to 7.1
Cadmium	milligrams per liter (mg/l)	0.003
Chromium	mg/l	0.050
Copper	mg/l	0.061
Lead	mg/l	0.049
Mercury	mg/l	<0.0001
Zinc	mg/l	0.075

The concentration of pollutants in the discharge from IMAT and SEI was approximated and reported as listed in the following table:

Parameter	Units	Measured Value
Flow rate	gallons per day (gpd)	15,000[1]
pH	standard units	Within the range of 6.5 to 8.5[2]
Fluoride	milligrams per liter (mg/l)	2[3]

[1] Flow was calculated as follows: (9 gallons per minute of deionized water makeup flow)*(60 minutes per hour)*(24 hours per day)*1.15; 1.15 is a factor to conservatively cover the volumes added with the addition of the process chemicals
[2] 3-stage acid waste neutralization system (AWN) final effluent
[3] Based on field tests, which represent only SEI 0.5% hydrofluoric acid operation

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Existing federal categorical limitations for this facility are found under 40 CFR Part 469—Electrical and Electronic Components Point Source Category, Subpart A—Semiconductor Subcategory. The following permit limitations are necessary to satisfy the requirement for AKART:

Pollutant of pollutant property	**Maximum for any 1 day**	**Average of daily values for 30 consecutive days**
	milligrams per liter (mg/l)	
Total toxic organics (TTO)	1.37	
Fluoride	32.0	17.4
pH	Within the range of 6.0-9.0 (standard units)	

TTO is defined for this industry (40 CFR 469.22) as the sum of the concentrations for each of the following toxic organic compounds which is found in the discharge at a concentration greater than ten (10) micrograms per liter (µg/l):

chloroform	ethylbenzene
phenol	pentachlorophenol
carbon tetrachloride	2,4,6 trichlorophenol
dichlorobromomethane	anthracene
1,2 dichloroethane	bis (2-ethylhexyl) phthalate
1,1 dichloroethylene	butyl benzyl phthalate
methylene chloride	1,2 dichlorobenzene
tetrachloroethylene	1,3 dichlorobenzene

toluene	1,4 dichlorobenzene
1,1,1 trichloroethane	1,2 diphenylhydrazine
1,1,2 trichloroethane	di-n-butyl phthalate
trichloroethylene	isophorone
2 chlorophenol	naphthalene
2,4 dichlorophenol	1,2,4 trichlorobenzene
2 nitrophenol	4 nitrophenol

Under 40 CFR 469.13 and 40 CFR 469.23, a certification of proper solvent management may be submitted in lieu of monitoring if the facility has an approved solvent management plan. In order to secure this exemption from regular monthly monitoring for TTO, IMAT must make the request in writing and submit a solvent management plan. IMAT will be required to complete quarterly sampling for TTO for one year before the exemption from regular monitoring will be allowed. The Department must approve the solvent management plan in order for the monitoring exemption to go into effect. After approval of the solvent management plan, the Department may allow IMAT to make the following certification as a signed attachment to the monthly discharge monitoring report (DMR):

> "Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for TTO, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to Ecology."

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect Salmon Creek Wastewater Treatment Plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by Hazel Dell Sewer District and codified in ordinance. Applicable limits for this discharge include the following:

Parameter	Units	Limits
pH	standard units	6.0-9.0
Total Suspended Solids (TSS)	milligrams per liter (mg/l)	300
5-day Biochemical Oxygen Demand (BOD_5)	mg/l	240
Arsenic	mg/l	0.1
Barium	mg/l	5.5
Beryllium	mg/l	90

Parameter	Units	Limits
Cadmium	mg/l	0.3
Chlorine Demand	mg/l	20
Chromium	mg/l	1.7
Copper	mg/l	2.2
Cyanide	mg/l	0.2
Iron	mg/l	10
Lead	mg/l	0.4
Mercury	mg/l	0.05
Nickel	mg/l	2.1
Selenium	mg/l	0.1
Silver	mg/l	0.1
Zinc	mg/l	2.3
Phenols or Cresols	mg/l	0.6
Oil and grease (total of petroleum and vegetable based)	mg/l	50

The Hazel Dell Sewer District may enter into special agreements with user with BOD_5 above 240 mg/l and TSS above 300 mg/l. For this reason the permit will not limit BOD_5 and TSS.

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through or hazardous exposure to POTW workers nor will it result in unacceptable pollutant levels in the POTW's sludge.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED SEPTEMBER 30, 1999

Parameter	Units	Existing Limits		Proposed Limits	
		Average Monthly[1]	Maximum Daily[2]	Average Monthly	Maximum Daily
Flow	gallons per day (gpd)				15,000
pH	standard units	Within the range of 6.0 to 9.0		Within the range of 6.0 to 9.0	
Copper	mg/l				2.2

Parameter	Units	Existing Limits		Proposed Limits	
		Average Monthly[1]	Maximum Daily[2]	Average Monthly	Maximum Daily
Fluoride	mg/l	17.4	32.0	17.4	32.0
Arsenic	mg/l				0.1
Barium	mg/l				5.5
Beryllium	mg/l				90
Cadmium	mg/l				0.3
Chlorine Demand	mg/l				20
Chromium	mg/l				1.7
Cyanide	mg/l				0.2
Iron	mg/l				10
Lead	mg/l				0.4
Mercury	mg/l				0.05
Nickel	mg/l				2.1
Selenium	mg/l				0.1
Silver	mg/l				0.1
Total toxic organics (TTO)	mg/l		1.37		1.37
Zinc	mg/l				2.3
Phenols or Cresols	mg/l				0.6
Oil and grease (total of petroleum and vegetable based)	mg/l				50

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The following are monitoring locations and parameters sampled:

Monitoring Location	Parameters Sampled
Deionized water makeup product stream	Flow
City water meter	Flow
Last compartment in the acid waste neutralization system (AWN)	All other parameters except flow

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

CONTINGENCY, SPILL CONTROL AND EMERGENCY RESPONSE PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

IMAT has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The plan was submitted to the Department on February 1, 2001. SEI has not submitted such a plan to the Department.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued until June 30, 2003.

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

The Department will publish a Public Notice of Draft (PNOD) on May 21, 2001, in *The Columbian* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
PO Box 47775

Olympia, WA 98504-7775 Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (360) 407-6280, or by writing to the address listed above.

This permit was written by Jacek Anuszewski, P.E.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring –Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater

facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic

effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C—RESPONSE TO COMMENTS

No comments received.